

This is in response to the Commission's efforts to assure local programming that serves community needs. First, as long as there is "local ownership" in media, I feel that competition will force media to serve its community of license in the best and most professional way that it can.

To assure the best service for the public, the Commission needs to re-enstate regulations that grant licenses (when there are competing applications) to persons who can prove that they are a part of the community, have a knowledge of broadcasting, and will dedicate 100% of their efforts to CREATE PROGRAMMING THAT WILL SERVE THEIR COMMUNITY.

It is my opinion that the Commission does not need to get into the regulation of "programming content". That is has the potential of destroying "Freedom of Speech" as granted in our Constitution.

To assure the best service to the citizens served by the media, the Commission should go back to "comparative hearings" in granting licenses. Let the applicant who vows to best serve a community receive the license. Give bonus points to the licensee being a part of a community, having a background in broadcasting, etc.

Now, a license is granted through an AUCTION. That results in the party with the most money being the one who gets the license. AUCTIONS have done more to destroy local programming, local involvement and local ownership in media than anything else.

We are seeing now that over the years, huge corporations with large financial resources are taking over this industry. Large groups look at the "bottom line" and try to figure how to operate by duplicating programming in several markets.

WGNS (AM) feels that a broadcast facility should be a "mirror of the community". In other words, if the public wants a certain type of music or information on specific subjects--that's what the media should program.

With local emergency situations, EAS is an effective SMALL TOOL. But it should only be the beginning. When severe storms, tornados, fires, chemical spills, etc. occur, the EAS is the FIRST ALERT. I feel that if the situation is serious enough, the broadcaster should stop regular programming and either insert on going updates or devote 100% of the airtime to giving information that will calm the community, give them needed information and serve as a source of communication between emergency professionals and local citizens. FCC regulations can not create this type of service. Instead it takes media ownership that is dedicated to serving the community. And again, AUCTIONS of licenses to the highest bidder instead of comparative hearings to give the license to the one who will best serve a community are killing the community service part of broadcasting.

WGNS (AM) does have programs that reflect the needs of our community. A minimum of five (5) hours each weekday are devoted to "live" interaction on local issues. The mayor, county mayor (formerly known as County Executive), police chief, sheriff, physicians, educators, etc. each has a REGULARLY scheduled time slot each month. They take open questions from the public on issues that concern them. The public is in control, and that's the way content should be.

Again, if there is LOCAL OWNERSHIP of media, the "competition" will force broadcasters to best serve the city of license. That's back to using "comparative hearings" to award licenses instead of "auctions to the highest bidder".

Programming to best serve "local needs" can also be improved by the NAB going back to having what was called "Seal of Good Practice" for television and a "Radio Code of Good Practices". Prior to the early 1970s, these guidelines were taken seriously by licensees. There was a "self policing" of media content (programming) by broadcasters and this was guided by these NAB codes. We need to re-institute NAB codes for today.

Local programming can be improved if we look at another change that was initiated 35-years ago. There is a difference between "censorship" and "freedom of speech". In my opinion "Freedom of Speech" includes broadcast material that is "accepted by the majority of the citizens of a community". I think it was 1971 or 1972, legislation was approved that allowed "words" to be used in the media that were previously now accepted. When that occurs, the curve is constantly "pushed". And now three and a half decades later the Commission is faced with outcries of "indecenty". Those regulations that were changed in the early 70s should be re-evaluated.

And finally, it was AM broadcasters that got all of this wonderful field of what is now called "mass communications" and "service to the community" possible. And yet, this is one of the few industries in America that "holds back" people who have a desire to serve a community. If an AM broadcaster tries to secure an FM license, but is unable to do so--this broadcaster who often has proven its ability to serve the needs of citizens in a city of license is "held back". FCC regulations have now closed the door on current LPFM licenses for "broadcasters", or has allowed FM translators to be secured by every FM operator, religious groups putting satellite feeds on it, etc.--the local AM broadcast is squeezed out again. I strongly feel that LOCAL PROGRAMMING to better serve a city of license can be achieved by allowing "licensees with a proven record of service" to take advantage of FM--and all of the pluses that go with that digital, RDBS, etc. LOCAL PROGRAMMING to better serve a community could be improved with another Commission re-evaluation: to permit AM broadcasters to utilize FM translators when one is available, to improve their service to the public.

I too am concerned with media serving citizens in their "city of license" in the best way possible. I don't envy the FCC's position of having to decide what will best serve the public. You certainly must have numerous conflicting suggestions.

These ideas are respectfully submitted for your consideration from a person who truly loves the broadcast industry and has been a part of this field since 1958 when I was a freshman in high school.

Sincerely,  
Bart Walker  
Chief Operator/Owner  
WGNS (AM)